

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden, on
behalf of themselves and others similarly
situated,

Plaintiffs,

v.

National Football League and NFL
Properties LLC, successor-in-interest to
NFL Properties, Inc.,

Defendants.

**THIS DOCUMENT RELATES TO:
ALL ACTIONS**

No. 12-md-2323 (AB)

MDL No. 2323

Hon. Anita B. Brody

**NOTICE OF JOINDER IN
PODHURST ORSECK, P.A.'S RESPONSE IN OPPOSITION TO
ESTATE OF KEVIN TURNER'S MOTION TO RESOLVE ATTORNEY FEE DISPUTE**

Goldberg, Persky & White, P.C. hereby joins, adopts, and incorporates by reference, in its entirety, Podhurst Orseck, P.A.'s response in opposition to the Estate of Kevin Turner's motion to resolve attorney fee dispute (ECF No. 7071). In support thereof, Goldberg, Persky & White, P.C. asserts:

1. Goldberg, Persky & White, P.C. currently represents over 500 class members eligible to participate in the settlement in this action, pursuant to individual contingency fee agreements.

2. Aside from the common benefit work that Goldberg, Persky & White, P.C. has performed, Goldberg, Persky & White, P.C. also has invested substantial amounts of time and resources representing class members pursuant to its retainer agreements, none of which it will be compensated for unless the class members obtain a recovery. This is of significant importance to our firm in light of the fact that we did not serve on the Plaintiff's Steering Committee, but yet undertook the risk to litigate this case from the filing of the very first two actions and have invested tens of thousands of hours of work and well over one million dollar in costs.

3. Goldberg, Persky & White, P.C. remains committed to representing its clients throughout the settlement process to ensure that they obtain the benefits to which they are entitled under the settlement. This work also requires a substantial investment of time and resources.

Dated: 1/12/2017

Respectfully submitted,

/s/ Jason E. Luckasevic
Jason E. Luckasevic
Goldberg, Persky & White, P.C.
11 Stanwix Street
18th Floor
Pittsburgh, PA 15222
(412) 471-3980- phone
(412) 471-8308- fax

CERTIFICATE OF SERVICE

I hereby certify that on this January 12, 2017, I caused the foregoing Notice of Joinder in Podhurst Orseck, P.A.'s Response in Opposition to Estate of Kevin Turner's Motion to Resolve Attorney Fee Dispute, to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania, on all parties registered for CM/ECF in the above-captioned matter.

By: /s/ Jason E. Luckasevic
Jason E. Luckasevic